



June 7, 2024

VIA ECF

Hon. Philip M. Halpern
U.S. District Court of the Southern District of New York
300 Quarropas Street
White Plains, NY 10601

Application granted. An amended Scheduling Order will be separately docketed.

SO ORDERED.

A handwritten signature in black ink, appearing to read "Philip M. Halpern".

Philip M. Halpern
United States District Judge

Dated: White Plains, New York
June 10, 2024

Re: *Soudani v. Soudani*, Case No. 23-cv-9905 (S.D.N.Y.) (PMH) (AEK)

Your Honor:

We represent Plaintiff and Counterclaim-Defendant Eman Soudani ("Plaintiff"). Pursuant to Rule 1.C of Your Honor's Individual Practices in Civil Cases, the Parties jointly request a 60-day extension of existing discovery deadlines set forth in the Civil Case Discovery Plan and Scheduling Order dated February 13, 2024.

Pursuant to the current order, all fact discovery is to be completed by June 18, 2024, all expert discovery is to be completed by August 2, 2024, and all discovery is to be completed by August 2, 2024. We request that the time to complete fact discovery be extend to and including August 19, 2024, the time to complete expert discovery be extended to and including October 1, 2024, and the time to complete all discovery be extended to and including October 1, 2024.

While the Parties have worked diligently to meet the existing deadlines, the Parties' document production is ongoing, including production of materials from electronic devices for which Parties have engaged third-party vendors. The Parties are also awaiting certain medical information from healthcare providers pursuant to HIPAA releases, and have engaged in meet and confer sessions to seek to resolve or narrow the scope of discovery disputes.

The Parties still intend to participate in the settlement conference scheduled for June 17, 2024 before Magistrate Judge Krause.

Lewis
Baach
Kaufmann
Middlemiss
PLLC

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Consistent with the Court's Individual Practices, we have attached a proposed revised Civil Case Discovery Plan and Scheduling Order setting forth new dates for the completion of discovery.

Thank you for your attention to this matter.

Sincerely,



Arthur D. Middlemiss

CC: All parties of record (via ECF)